

Commonwealth of Kentucky
Division for Air Quality
COMMENTS AND RESPONSE
ON THE DRAFT PERMIT

Conditional Major, Operating

Permit: F-08-011

Weyerhaeuser Company

Henderson, KY 42420

June 5, 2008

Luis D. Fuentes, Reviewer

SOURCE ID: 21-101-000117

AGENCY INTEREST: 5506

ACTIVITY: APE20080001

SOURCE DESCRIPTION:

The Henderson Mill produces recycled linerboard and corrugating medium from old corrugated container furnish via a twin-wire paper machine. The Mill consists of a stock preparation area, paper machine, roll winding, warehouse, effluent mixing/ surge pond, and miscellaneous storage tanks storing various process chemicals.

The Henderson Mill is located in an attainment area for all regulated pollutants, and its operations are not covered on the list of 28 defined in Prevention of Significant Deterioration of Air Quality (PSD) source categories. The potential emissions of all pollutants are well under 250 tons per year (tpy) (96.4 tpy of NO_x, 79.4 tpy of CO, and 50.9 tpy of VOC); as such, the Mill is an existing minor source under the PSD program.

The current permit contains emissions limitations and recordkeeping requirements that limit emissions of NO_x to 98 tpy, VOC to 90 tpy, individual hazardous air pollutants (HAPs) to 9 tpy, and combined HAPs to 22.5 tpy. These limitations ensure that the Mill will remain a conditional major source for all pollutants.

PUBLIC AND AFFECTED STATE REVIEW:

PUBLIC AND U.S. EPA REVIEW:

On April 10, 2008, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Gleaner* in Henderson, Kentucky. In addition, notification of the issuance of the draft permit was sent to the U.S. EPA and affected states on April 8, 2008 via e-mail. The public comment period expired 30 days from the date of publication.

Comments were received Weyerhaeuser Company on May 16, 2008. The following section lists the comments received, the Division's response to each comment, and a detailed explanation of the changes made to the permit. Minor changes were made to the permit as a result of the comments received; however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed.

COMMENTS AND RESPONSE:

Comments Weyerhaeuser Company submitted by Larry Griffin, Environmental Manager.

Permit Application Summary Form

1. The potential emissions summary listed on the second page of the application summary does not match the data provided in Table 4-5 of the permit renewal application for the Henderson mill. Please update the table in the application summary to list the following values for potential emissions.

Pollutant	Potential (tpy)
PM/PM ₁₀	7.2
SO ₂	0.6
NO _x	96.4
CO	79.4
VOC	50.9
Single HAPs (Methanol)	3.5
Source Wide HAPs	9.3

Also, the potential emission values listed in the third paragraph under the heading “Source Description” should be updated to reflect the values provided above and in Table 4-5 of the permit renewal application.

Division’s response: Comment acknowledged, change made.

Permit Statement of Basis

2. In the descriptions for Emission Points 01 through 05, several chemicals are listed as “Materials Used” for each emission point. Weyerhaeuser would like to clarify that chemicals listed only highlight the key materials used in the linerboard and corrugating medium manufacturing process.

Also, the main ingredient used in the process for each emission point, pulp solution or paper, is not included in the Statement of Basis in the list of materials used. Further, some of the materials currently listed are brand names of particular chemicals that are currently used as additives in the paper making process at the Henderson mill. The individual chemical additives used in these processes are continually re-evaluated and can change from time to time. Therefore, although the list of materials used may be accurate for the chemical additives currently in use at the Henderson mill, this may not continue to be the case for the life of this permit.

To avoid confusion over the fact that the list of “Materials Used” is not complete and to reflect the fact that the brands of individual chemicals may change periodically, please remove the “Materials Used” from the description of each emission point in the Statement of Basis. If KDAQ desires to keep this category in the description of each emission point in the Statement of Basis, please update the descriptions to reflect the flexibility in additives used in each process. For example, for the Disc Thickener, the material used could be listed as “*Pulp solution, Paper making additives (e.g., biocide)*”.

Division’s response: Comment acknowledged, change made.

3. Please update the construction date listed for the Boiler (Emission Point 07) on Page 3 of 4.

October 1995, which is listed on the DEP7007A form in the renewal application and in the Statement of Basis, was the date on which the boiler commenced operation, not the date on which construction was commenced. Please use January 1995 as our best estimate for boiler construction commencement.

Division's response: Comment acknowledged, change made.

Proposed Permit

4. As described in the permit renewal application, actual production for the paper making units (Emission Points 01 through 05) at the Henderson mill may occasionally be greater than 33 machine dry tons of paper per hour; therefore, the term "projected capacity" is more appropriate than "maximum capacity" for these units. To reflect this fact, the capacity should be listed as "*Projected capacity: 33 machine dry tons of paper/hr on a daily average*".

Division's response: The Division concurs with the comment and has revised the permit as suggested by the source.

5. As stated in Condition 1 on Page 4 of 19, propane may be used as a back-up fuel in the steam boiler for no more than 10% of the year. Over the last several years, Weyerhaeuser has operated the boiler using only natural gas as fuel because there have not been recent fuel supply interruptions. Because propane has not recently been used as fuel for the boiler, a relative accuracy test audit (RATA) has not been conducted on the newly developed PEMS while firing propane. Weyerhaeuser feels that a RATA while firing propane in the boiler is not necessary because propane is used only as an emergency back-up fuel and is used very infrequently. Therefore, we request that an additional condition be added to the boiler section of the proposed permit to specifically state that a RATA is only required when firing propane in the boiler upon request of KDAQ, which will allow KDAQ to request a RATA if propane usage in the boiler is increased at a later time.

Division's response: Comment acknowledge. The Division added "In accordance with Subsection 1.0 Operating Limitations, propane usage shall be limited, and a relative accuracy test audit (RATA) while firing propane is not required" for the compliance demonstration, page 5 of 19 of the permit.

6. Revise Condition 2.d on Page 5 of 19 to read "*The permittee shall install, calibrate, maintain, and operate PEMS for predicting excess emissions of nitrogen oxides...*" instead of "*The permittee shall install, calibrate, maintain, and operate PEMS for measuring nitrogen oxides emissions...*". This revision will make the permit condition reflect the intent of NSPS Subpart Db, which allows for the use of a PEMS to predict excess emissions of nitrogen oxides. Emissions of nitrogen oxides can be measured using a stack test or CEMS, but can only be predicted using a PEMS.

Division's response: The Division concurs with the comment and has revised the permit to use the term "predict". The Division reminds the permittee that the PEMS will be used to certify compliance with the Conditional Major NOx limit of 98 tons per year.

7. Condition 3.b on Page 5 of 19 requires Weyerhaeuser to monitor steam generating unit operating conditions and predict nitrogen oxides emission rates as stated in a PEMS Plan submitted to KDAQ pursuant to 40 CFR 49b(c). Weyerhaeuser would like to point out that the current PEMS Plan, submitted with the permit renewal application, contains references to draft Performance

Specification (PS) 16, which has not yet been promulgated in final form. Please note that we intend to review the PEMS Plan after PS 16 has been promulgated in final form to ensure that any changes made to the draft version of PS 16 are reflected, as necessary, in the PEMS Plan for the Henderson mill steam boiler. No changes are requested to the permit as a result of this comment at this time; this comment is included here only for information purposes.

Division's response: Comment noted.

8. Condition 4.f on Page 5 of 19 of the proposed permit requires process variables used by the PEMS model to be monitored on an hourly basis during **all** periods of operation of the boiler. However, as stated in Condition 6.a on Page 6 of 19, data recorded during periods of SSM, repairs, adjustments, and calibration checks is not used to predict compliance with the NO_x emission limitation of NSPS Subpart Db. Since the process variables recorded during offline periods are not used to determine excess emissions, it follows that monitoring of these variables should not be necessary during offline periods. Therefore, we request that the first sentence of Condition 4.f be revised to read, “During all periods of operation of the affected facility (**except periods of SSM, repairs, adjustment, and calibration checks**), the process variables used by the PEMS model, ...”.

Division's response: The Division has revised the permit as requested by the source.

9. On Page 6 of 19, please update the text in Condition 4.g to state “...as described in **an** approved PEMS Plan...” instead of “...as described in **and** approved PEMS Plan...”.

Division's response: The Division has revised the permit as requested by the source.

10. Please update Condition ii under the heading “Other Monitoring Requirements” on Page 6 of 19 to be consistent with the similar requirement in Condition 4 on Page 3 of 19. In particular, the beginning of the last sentence of this condition should be updated to state “Upon completion of this review **as per guidance**, ...” instead of “Upon completion of this review, ...”.

Division's response: The Division has revised the permit as requested by the source.

11. There are emission limitations specified in the proposed permit for significant units at the Henderson mill, but there are no process limitations specified in the proposed permit. To avoid confusion regarding whether process rates listed in the process description sections of the permit are in fact, process limitations, we request that Condition D.1 on Page 8 of 19 be updated to remove the mention of “process limitations” and “processing rates”.

Division's response: The permit has not been modified. The permittee is correct that process descriptions are not process limitations. The language in Section D of the permit is general permit language that is only applicable to Weyerhaeuser if there are permit limitations in the permit.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with

applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.